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Employees of the Safeco P & C Insurance Companies
July 25, 2008

BY ELECTRONIC FILING

Hon. Denny Chin
United States District Judge
500 Pearl Street
New York, NY 10007-1312

Re: Kraft, Timothy v. The City of New York, et al.
Case No.: 07 CV 2978 (DC)

Dear Judge Chin:

We represent Center for Urban Community Services, Inc. in this § 1983 Civil Rights Act dispute. As you know, the discovery in this matter shall be completed on or before September 12, 2008. We respectfully request on behalf of all parties that the discovery schedule be extended to October 30, 2008.

On July 17, 2008, we received Combined Notice of Deposition ("the Notice") from Ms. Rose Weber who represents the Plaintiff. Pursuant to the Notice, eleven parties are to be deposed between August 22, 2008 and September 11, 2008.

Yesterday, I spoke with Ms. Weber to discuss the proposed EBT schedule. I informed her that I will be leaving on August 6, 2008 for a two-week vacation and will be back on August 18, 2008. Between August 22 and September 12, 1008, I will be actually engaged in other court ordered depositions, arbitrations, and mediations. I also will be covering for other attorneys who will be out of the office during this time. In addition, counsel for other co-defendants have informed me that they also have conflict with the proposed schedule. As such, it will be extremely difficult for us to complete all eleven depositions in the time allotted.

If Your Honor is inclined to grant this request, you may do so by executing this letter at the "So Ordered" signature line below.

Respectfully submitted,

s/
Hendrick Vandamme (HV-7702)

Cc: Rose M. Weber, Esq.
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The parties having made an application to extend the discovery schedule until October 15, 2008, and good cause appearing to grant the application,

NOW, THEREFORE, IT IS ORDERED THAT the discovery schedule be extended to October 30, 2008.

SO ORDERED

HON. DENNY CHIN
U.S.D.J.